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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REQUEST FOR
ORDERS BY DEFAULT AS TO
UNOPPOSED OBJECTIONS IN EIGHTH
AND FIFTEENTH OMNIBUS OBJECTIONS
TO CLAIMS**

[Re: Dkt. Nos. 8983 and 9073]

**Resolving Objections Set for Hearing
November 17, 2020 at 10:00 a.m. (Pacific Time)**

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PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, “**PG&E**” or the “**Debtors**” or as reorganized pursuant to the Plan (as defined below), the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter orders by default on the *Reorganized Debtors’ Eighth Omnibus Objection to Claims (No Liability Claims)* [Docket No. 8983] (the “**Eighth Omnibus Objection**”) and the *Reorganized Debtors’ Fifteenth Omnibus Objection to Claims (Satisfied Claims)* [Docket No. 9073] (the “**Fifteenth Omnibus Objection,**” and, together with the Eighth Omnibus Objection, the “**Omnibus Objections**”).

RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS

The Omnibus Objections seek to disallow and/or expunge the Proof(s) of Claim listed in Exhibit 1 to each Omnibus Objection.

NOTICE AND SERVICE

The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection [Docket Nos. 8985 and 9075]. The Omnibus Objections also were supported by the respective declarations of Robb McWilliams [Docket Nos. 8984 and 9074]. The Eighth Omnibus Objection, the Notice of Hearing, and the Declaration was served as described in the *Certificate of Service of Andrew G. Vignali*, filed on September 15, 2020 [Docket No. 9044]. As further described therein, on September 4, 2020, each Proof of Claim listed on Exhibit 1 to the Eighth Omnibus Objection received a notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection with respect to the applicable claim to be disallowed and/or expunged, and (ii) the claim number, claim amount and priority of the surviving claim for each counterparty.

The Fifteenth Omnibus Objection, Notice of Hearing, and the Declaration was served as described in the *Certificate of Service of Andrew G. Vignali*, filed on September 28, 2020 [Docket No.

1 9159]. As further described therein, on September 21, 2020, each Proof of Claim listed on Exhibit 1 to
2 the Fifteenth Omnibus Objection received a notice customized to include (i) the claim number, debtor,
3 claim amount and priority, and the basis for Reorganized Debtors' objection with respect to the
4 applicable claim to be disallowed and/or expunged, and (ii) the claim number, claim amount and
5 priority of the surviving claim for each counterparty.

6 The deadline to file responses or oppositions to the Omnibus Objections has passed. The
7 Reorganized Debtors received a timely response to the Eighth Omnibus Objection from Irene George
8 (Claim No. 5239). She directed the Reorganized Debtors to re-serve the Eighth Omnibus Objection on
9 her next of kin. The Reorganized Debtors did so, and granted her sons an extension of the response
10 deadline to October 13, 2020. The Reorganized Debtors did not receive a further response to the
11 Eighth Omnibus Objection.

12 The Reorganized Debtors received a timely request for an extension of the response deadline
13 from Halkirk I Wind Project LP (Claim No. 20020). The Reorganized Debtors agreed to extend the
14 response deadline to October 28, 2020. The Reorganized Debtors did not receive a response to the
15 Fifteenth Omnibus Objection from Claimant.

16 **DECLARATION OF NO OPPOSITION RECEIVED**

17 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

- 18 1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the
19 Reorganized Debtors
- 20 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no
21 responses have been filed with respect to the Omnibus Objections.
- 22 3. This declaration was executed in San Francisco, California.

23 WHEREFORE, the Reorganized Debtors hereby request entry of Orders disallowing and
24 expunging Claim Nos. 5239 and 20020.

25 Dated: November 13, 2020

KELLER BENVENUTTI KIM LLP

26 By: /s/ Dara L. Silveira
27 Dara L. Silveira

28 *Attorneys for Debtors and Reorganized Debtors*